

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

----- X
JOHN J. VAUGHN, GERALD A.
KALBFLEISCH, MICHAEL HATHAWAY :
and MYRTLE HATHAWAY :
:
Plaintiffs, :
:
v. : Civil Action
No. 04-10988-GAO
:
PUTNAM INVESTMENT MANAGEMENT,
LLC and PUTNAM RETAIL :
MANAGEMENT, LLP :
:
Defendants.
----- X

**DEFENDANTS' ASSENTED-TO MOTION FOR LEAVE TO SUBMIT A
SURREPLY IN OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL**

Pursuant to Local Rule 7.1(B)(3), Defendants Putnam Investment Management, LLC and Putnam Retail Management Limited Partnership ("Defendants") respectfully move this Court for leave to submit a five-page surreply memorandum in further opposition to Plaintiffs' motion to compel. The surreply memorandum will respond to arguments newly presented by Plaintiffs' Reply Memorandum. The proposed surreply memorandum is attached hereto as Exhibit 1.

WHEREFORE, Defendants respectfully request that this Court grant Defendants leave to submit the surreply memorandum in further opposition to Plaintiffs' motion to compel.

LOCAL RULE 7.1(A)(2) CERTIFICATION

The undersigned counsel hereby certifies that counsel for Defendants has conferred with counsel for Plaintiffs who have assented to the requested relief (in exchange for Defendants' assent to Plaintiffs' motion for leave to file their 18-page reply brief).

Dated: June 6, 2006
Boston, Massachusetts

Respectfully submitted,

/s/ James R. Carroll
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Counsel for Defendants Putnam
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Putnam Retail Management Limited Partnership

Certificate Of Service

I, Scott T. Lashway, hereby certify that on June 6, 2006, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those as non-registered participants.

Dated: June 6, 2006

/s/ Scott T. Lashway
Scott T. Lashway